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Attorneys for Defendant
Bitmain Technologies, Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOR GEVORKYAN, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

BITMAIN, INC., BITMAIN
TECHNOLOGIES, LTD., and DOES 1 to 10,

Defendants,

Case No. 3:18-CV-07004-JD

**DECLARATION OF CARLOS M.
LAZATIN IN SUPPORT OF JOINT
STIPULATION (1) UNDER LOCAL
RULE 6-1(a) EXTENDING
DEFENDANT BITMAIN
TECHNOLOGIES LTD.'S TIME TO
RESPOND TO THE COMPLAINT; (2)
UNDER LOCAL RULE 6-2 SETTING
BRIEFING SCHEDULE ON MOTION
TO DISMISS COMPLAINT; AND (3)
RESETTING CASE MANAGEMENT
CONFERENCE**

Complaint Filed: November 19, 2018
Trial Date: None Set

DECLARATION OF CARLOS M. LAZATIN

I, Carlos M. Lazatin, hereby declare and state as follows:

1. I am an attorney admitted to practice before all courts of the State of California and in the Northern District of California, and I am a partner at O'Melveny & Myers LLP, counsel of record for Defendant Bitmain Technologies, Ltd. ("Bitmain") in the above-captioned case. I submit this declaration based upon my personal knowledge and, if called as a witness, could and would testify to the matters set forth below.

2. The parties have conferred regarding Bitmain's response to the pending Complaint, Plaintiff's anticipated filing of a First Amended Complaint, a briefing schedule regarding a possible motion to dismiss the First Amended Complaint, and rescheduling the Case Management Conference in this matter pending a ruling on the motion to dismiss.

3. The parties agree that Plaintiff Gor Gevorkian ("Plaintiff") shall file his First Amended Complaint by August 30, 2019, and counsel for Plaintiff has agreed to extend the deadline by which Bitmain must answer or otherwise respond to the First Amended Complaint to October 1, 2019.

4. Subject to the approval of the Court, the parties have also agreed to the following briefing schedule to give all parties adequate time to prepare their briefs in the event that Bitmain files a motion to dismiss or other motion in response to the First Amended Complaint: Plaintiff shall have until October 23, 2019, to file any opposition to the motion; Bitmain shall have until November 7, 2019, to file any reply in support of the motion; and the motion shall be heard on November 21, 2019, at 11:00 a.m. or on the Court's first available hearing date thereafter.

5. The parties also agree and propose that the date for the Case Management Conference shall be set at the hearing on the motion to dismiss or shall otherwise be set by the Court after a determination regarding any challenge to the First Amended Complaint.

6. There have been two time modifications in this case: (1) the Court's Order granting Plaintiff's request for an extension of time to serve Bitmain (ECF No. 26); and (2) the Court's Order vacating the March 7, 2019 Case Management Conference in light of Plaintiff's then-continuing efforts to serve Bitmain with the Complaint (*Id.*).

Executed this 12th day of July, 2019, in Los Angeles, California.

2